

**Emergency Responder Fitness Standards  
Proposal/Information for Unions  
July 17, 2015**

**I. Purpose:**

On September 30, 2014, Dana Tulis, Deputy Director of the EPA Office of Emergency Management (OEM) issued a memorandum entitled “Emergency Response Program Level A/B/C Personal Protective Equipment (PPE) Implementation Plan.” Among other things, that memorandum called on OEM to draft

- a proposed baseline national Fitness Standard for those employees, On Scene Coordinators (OSCs) and designated Special Team members who, as a condition of employment, are required to be capable of using Level A/B/C PPE;
- a program for periodic evaluations to confirm that such employees meet the Fitness Standard; and,
- record-keeping requirements to track compliance with all the training and medical monitoring associated with those requirements.

That memorandum also called on OEM to develop a national policy addressing those situations where an OSC or designated Special Team member is unable to meet the national Fitness Standard; or is not deemed medically fit for duty; or is placed on restricted duty for medical reasons.

This document provides the draft national Fitness Standard and policy called for in the September 30, 2014, memorandum.

**II. Background:**

The September 30, 2014, memorandum provides the background for the requirement that OSCs and designated Special Team members<sup>1</sup> must be knowledgeable and aware of all aspects of a Level A/B/ PPE response, including worker health and safety, and that they should be capable of using such PPE.

OSCs may be required to work in the field under challenging, complex, high stress circumstances, including adverse environmental conditions such as extreme high or low temperatures, high humidity, high wind, and precipitation, low light (night-time), rough terrain; and debris-strewn sites. Furthermore, they may be required to work in these adverse conditions for extended hours for a number of days before additional resources arrive on scene. (In this regard, the nature of field work that OSCs may be required to carry out differs from and is potentially more demanding than the field work typically carried out by certain other categories of EPA employees.) It is therefore especially important that OSCs have a minimum level of general physical fitness so that they may safely perform their work under such conditions.

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<sup>1</sup> In the remainder of this memorandum the term “OSCs” should be read to include both OSCs and designated Special Team members.

OSCs are subject, pursuant to their Position Description, to annual medical monitoring as a condition of employment. Medical clearance from a Federal Occupational Health certified occupational medical physician, based on the results of a medical monitoring examination, has historically been relied upon by both the employees and by EPA as assurance that the employee is fit for duty and can safely use Level A/B/C PPE.

The annual medical monitoring program includes completion by the employee of a questionnaire regarding, among other elements, the type of chemicals involved in the response actions on which the employee worked; a physical examination by a medical doctor; blood chemistry; pulmonary function evaluation; and visual acuity examination. The annual medical monitoring program has not included an element to help OSCs and their managers assess whether the OSCs have a minimum level of general physical fitness so they can safely perform their work under the kinds of conditions described above.

### III. **Discussion:**

As described above, OSCs may be required to work in the field under especially difficult and adverse circumstances.

The possible need for OSCs to use Level A, B or C PPE, in addition to requiring appropriate training,<sup>2</sup> also imposes physical burdens beyond those presented by such adverse field conditions.

The current annual medical monitoring program does not include a direct evaluation of the employee's aerobic or cardiovascular fitness, muscular flexibility, or similar physical fitness attributes that are pertinent to their general physical fitness to work under the kinds of field conditions described above, including but not limited to their ability to work safely using Level A, B or C PPE.

EPA is therefore augmenting the annual medical monitoring program for OSCs by also establishing a National Fitness Standard with which OSCs must demonstrate compliance on annual basis.

### IV. **National Fitness Standard**

The National Fitness Standard (NFS) incorporates four elements, with a specified number of points associated with the level of performance in each element:

- A. Aerobic/Cardiovascular Fitness: The employee covers a distance of 1.5 miles on level ground (or on a treadmill with settings comparable to level ground). The employee must cover that distance in at least 22 minutes. Points are awarded as specified in Attachment A.
- B. Muscular Flexibility: The employee follows the instructions in Attachment A, and points are awarded as specified in Attachment A.

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<sup>2</sup> The September 30, 2014 memorandum also calls on OEM to develop a national Level A/B/C PPE training program.

- C. Upper Body Strength: The employee performs push-ups during a two minute period. Points are awarded as specified in Attachment A.
- D. Abdominal and Back Strength: The employee performs curl-ups during a two minute period. Points are awarded as specified in Attachment A.

The employee must score at least 15 points on the Aerobic/Cardiovascular element, and must score a total of at least 75 points on all four elements combined (referred to below as “the minimum NFS requirements”).

## **V. Applicability and Implementation**

Prior to initiating the annual NFS evaluation, each OSC must be cleared by a medical doctor to undergo the NFS evaluation. This clearance may be provided by the Federal Occupational Health (FOH) medical doctor who carries out the annual medical monitoring evaluation; or it may be provided by the employee’s personal doctor.

For all OSCs, the NFS evaluation will be carried out within four months after the employee’s annual medical monitoring evaluation.

New candidates for an OSC position must satisfy the minimum NFS requirements prior to being accepted for employment as an OSC.

The NFS evaluation will be administered by FOH. The results of the NFS evaluation will be provided in writing by FOH to the employee’s supervisor.

### **A. Employees Unable to Satisfy the Minimum NFS Requirements**

If an OSC is unable to satisfy the minimum NFS requirements set out in Section IV, above, FOH will provide the employee with advice on how to improve his/her performance.

Until such time as the employee is able to satisfy the minimum NFS requirements, the employee will not be deployed to a response that requires field activity. (The employee may be deployed to a response that requires only office activity, such as at a command station.)

OSCs hired on or after \_\_\_\_\_ [date to be determined] are required, pursuant to their Position Description, to be able and to remain able to satisfy the minimum NFS requirements (except during a period of temporary unfitness for unrestricted field duty, as described in Paragraph V.B., below).

OSCs hired prior to \_\_\_\_\_ [date to be determined], who on that date are able to satisfy the minimum NFS requirements, are expected to make all reasonable effort to remain in that category (except during a period of temporary unfitness for unrestricted field duty as described in Paragraph V.B., below).

OSCs hired prior to \_\_\_\_\_ [date to be determined], who on that date are unable to satisfy the minimum NFS requirements are expected to make all reasonable efforts to improve their performance so as to be able to satisfy the minimum NFS requirements

(except during a period of temporary unfitness for unrestricted field duty as described in Paragraph V.B., below).

An OSC may provide a certification from a medical doctor that his/her inability to satisfy the minimum NFS requirements is due to a specified condition that does *not* render the employee unfit to carry out the full and unrestricted field activities associated with the duties of an OSC, including the use of Levels A, B and C personal protective equipment. If such a certification is provided, the provisions of Section V.C., below, shall not apply.

**B. Temporary Unfitness for Unrestricted Field Duty:**

If an OSC is unable to satisfy the minimum NFS requirements due to a condition that is expected to be temporary (e.g., a broken bone or muscle strain that is expected to heal, an illness or medical operation from which the employee is expected to recover, pregnancy, etc.), then arrangements will be made to allow the employee to perform duties that are not unsuitable for the employee's condition. For the purpose of this paragraph, "temporary" means 12 months or less.

**C. Extended Unfitness for Unrestricted Field Duty**

If, for more than 12 months, an OSC has been unable to satisfy the minimum NFS requirements the employee will be assigned to non-field duty, reassigned, or released from employment, in conformance with applicable Agency rules and guidance, and based on the following:

- a. OSCs hired prior to \_\_\_\_\_ [date to be determined], will be assigned to non-field duty for an additional period of up to one year; thereafter they may, at the discretion of management, be reassigned to a suitable non-OSC position if one is available.
- b. OSCs hired on or after \_\_\_\_\_ [date to be determined], will be released from employment or, at the discretion of management, reassigned to a suitable non-OSC position if one is available.

**VI. Recordkeeping**

As noted above, the September 30, 2014, memorandum calls for establishment of record-keeping requirements to track compliance with the training and medical monitoring requirements applicable to OSCs. The current "Page 10" of the medical monitoring documentation will include the finding of the medical doctor regarding an employee's clearance to undergo the annual NFS evaluation. The NFS evaluation results will be provided in writing by the FOH Fitness Coordinator to the employee's supervisor; that documentation will be filed by the supervisor and the file will be maintained in the same manner as the supervisor maintains the filed Page 10 medical monitoring documentation.

## Attachment A

### National Fitness Standard -- Elements and Scoring

#### I. **Aerobic/Cardiovascular Fitness – 1.5 Mile Run/Walk**

Instructions: Participant is timed covering 1.5 miles by running, walking or a combination on level ground (or on a treadmill set to emulate movement on level ground).

Scoring is based on total time to complete 1.5 miles:

Time in Minutes	Score
Less than 12:00	50
12:01 – 13:00	40
13:01 – 14:00	35
14:01 – 15:00	30
15:01 – 16:00	25
16:01 – 19:00	20
19:01 – 22:00	15
More than 22:01	0

#### II. **Muscular Flexibility – Sit and Reach**

Instructions: The participant sits facing a wall with legs straight (back of both knees against the floor), and with the soles of the feet flat against the wall. Moving slowly, the participant attempts to reach forward towards the wall with his/her fingertips. Legs must stay straight, with the back of both knees against the floor. If the participant is unable to touch his/her fingertips to the wall, then the distance between the wall and the fingertips is measured with a ruler (to the nearest half inch) while the participant holds his/her position. The employee's fingertips must reach within 20 inches or less of the wall. If so, 20 points are awarded.

Scoring: No points (0) are awarded if the employee's fingertips do not reach within 20 inches of the wall; no additional points beyond 20 are awarded if the employee's fingertips reach closer than 20 inches to the wall.

#### III. **Upper Body Strength – Push-Up**

Instructions: Participant's body is supported by the hands and toes, with arms extended. Participant starts in the "up" position. Participant lowers body so that chest is no more than three inches above the floor). Participant raises body back to starting position.

Scoring is based on the number of push-ups performed in 2 minutes:

Number of Push-ups in 2 Minutes	Score
45 or more	90
41-45	80
35-40	70
30-34	60
25-29	50
20-24	40
15-19	30
10-14	20
5-9	10
Fewer than 5	0

#### **IV. Abdominal Strength – Curl-Up**

Instructions: Participant lies with back on the floor, arms at the side. Legs may be stretched out or bent at the knees, as the participant prefers. Participant raises torso until vertical, while arms remain at side. Arms and hands are not used to raise the torso, and the legs are not held in place by an observer. Participant lowers torso back to starting position.

Scoring is based on the number of curl-ups performed in 2 minutes:

Number of Curl-ups in 2 Minutes	Score
45 or more	90
41-45	80
35-40	70
30-34	60
25-29	50
20-24	40
15-19	30
10-14	20
5-9	10
Fewer than 5	0